



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Ocean Service
Office of Ocean Resources Conservation and Assessment
Hazardous Materials Response and Assessment Division
7600 Sand Point Way NE, BIN C15700
Seattle, WA 98115

19 March 1998

Mr. Chuck Clarke
Regional Administrator
U.S. Environmental Protection Agency, Region X
1200 Sixth Avenue
Seattle, WA 98101

Dear Mr. Clarke:

I am writing on behalf of the National Oceanic and Atmospheric Administration (NOAA) to request that the Environmental Protection Agency perform a Preliminary Assessment, as described in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Section 105 (d). This assessment should initiate a comprehensive approach to evaluating and remediating contaminated sediments in the lower Duwamish River, King County, Washington.

NOAA acts on behalf of the Secretary of Commerce as a Federal trustee for living and non-living natural resources in coastal and marine areas. Resources of concern to NOAA include all life stages, wherever they occur, of fishery resources of the exclusive economic zone and continental shelf; anadromous species throughout their ranges; endangered and threatened species for which NOAA is responsible, and the ecosystems supporting these living marine and anadromous resources. In the case of the Duwamish River, NOAA is a co-trustee with the Department of Interior, the State of Washington, the Muckleshoot Indian Tribe, and the Suquamish Tribe.

The Duwamish estuary is an important habitat for more than 50 fish species, including chum, chinook, and coho salmon and steelhead trout. The river supports recreational, subsistence, and commercial fishing. Three salmon hatcheries within the Duwamish River system release approximately 10 million juvenile salmon each year. The river, its tributaries, and surrounding habitat support an equally large natural salmon run, as well as more than 80 species of birds and 9 species of mammals.

As you are no doubt aware, NOAA's National Marine Fisheries Service (NMFS) recently announced a proposal to list Puget Sound chinook salmon populations, including those utilizing the Duwamish River, under the Endangered Species Act. Investigations carried out over several years by the NMFS Northwest Fisheries Science Center have demonstrated that exposure



of outmigrating juvenile salmon to contaminated Duwamish River sediments is associated with a range of deleterious effects, including reduced growth, reduced immune system function, and increased mortality following exposure to pathogens. The Duwamish River is among areas proposed by NMFS for designation as critical habitat for chinook salmon.

The recent Resource Conservation and Recovery Act (RCRA) investigations at the Boeing Plant 2 facility have documented significant PCB releases to the Duwamish River and sediments. Sampling by the King County Department of Natural Resources also demonstrates that PCBs and other contaminants have accumulated in Duwamish River sediments. NOAA is concerned that current RCRA investigations at the Boeing Plant 2 facility are limited in geographic scope and that significant contamination extends beyond the area currently under consideration for remediation within the corrective measures study. Preliminary results of a survey of PCBs in Duwamish sediments conducted by NOAA indicate contamination in areas downstream and across the river channel from the limited area under consideration by the RCRA program.

NOAA specifically requests that EPA perform a comprehensive sampling program under Superfund, coordinate with NOAA as provided for in CERCLA Section 104 (b)(2) to determine the nature and extent of contamination within the Duwamish River, and take the remedial actions necessary to protect this important marine habitat.

Sincerely,



David Kennedy, Chief
Hazardous Materials Response
and Restoration Division

cc: W. Connor (NOAA/DAC)
A. Fritz (NOAA/CRC)
C. O'Connor (NOAA/GC)



Region 10
1200 Sixth Avenue
Seattle WA 98101

Alaska
Idaho
Oregon
Washington

June 15, 1998

Lower Duwamish River Sampling Seattle, WA

The U.S. Environmental Protection Agency (EPA) will be conducting an assessment of the lower Duwamish River this summer.

Why is EPA Involved?

The National Oceanic and Atmospheric Administration (NOAA) petitioned EPA to conduct an assessment of the lower Duwamish River. The federal Superfund Law, also known as CERCLA, allows the public and other agencies to request EPA to conduct assessments of potential releases of hazardous substances. NOAA has responsibility under the Superfund law to protect natural resources in coastal and marine waters, which includes salmon and other fish species found in the Duwamish River. NOAA is concerned about contamination in the whole Duwamish waterway and what kind of impacts the contamination is having on the fish species.

What is an EPA Assessment?

In general, an assessment process is used to determine which sites qualify for the National Priorities List (NPL), which is a listing of the nations priorities for full scale environmental investigation and possible cleanup. Samples are collected to determine what hazardous substances are present at the site and whether the substances are being released into the environment.

Typically an assessment includes a Preliminary Assessment (PA) and a Site Investigation (SI). The PA activities include file information review and a site visit. SI activities include review of any available data, development of field work plans, field sampling and filling data gaps. When it is clear that a site warrants a SI, combining the PA and SI reduces costs and repetitive tasks.

What is Planned for the Lower Duwamish?

This fall, EPA will begin sampling from near the southern end of Harbor Island (approximately river kilometer 1.5) to just south of the turning basin (approximately river kilometer 11.5). Sediment and core samples will be taken from the river and slips and analyzed for a number of hazardous substances. EPA will not be conducting any upland (soil) sampling during this assessment.

How Does This Relate to Other Projects in the Area Like the Brownfields Showcase Community, Habitat Restoration Plans, and Other Water Quality Efforts?

EPA is aware of a multitude of projects and other efforts to restore and enhance the Duwamish river corridor both environmentally and economically. EPA is currently working with the City of Seattle and King County on development of their Brownfields Showcase Community Workplan and has made them aware of the upcoming Duwamish study so they can plan to make use of the results as appropriate. One of their priorities is completion of an ongoing study of groundwater pathways in the Duwamish corridor, and another is planning for preservation and restoration of salmon habitat. This project will complement those endeavors by increasing the understanding of the health of the river so that beneficial use can be maintained for all river users.

What Happens Next?

EPA will be releasing fact sheets, such as this one, to keep interested citizens informed. Before sampling begins, EPA will hold a public meeting to discuss the upcoming sampling activities and Superfund process. Please feel free to share this fact sheet with other people you know who may be interested. If there is a mailing label with your address on the back of this fact sheet, you have been added to our mail list and don't need to do anything. If not, and you would like to be added to the mail list, please contact Krista Rave, Outreach Coordinator in Seattle at (206) 553-6686 and leave your name and address.

DAVID BENNETT, SITE COORDINATOR/
553-2103 MANAGER